## Department of Land and Natural Resources Division of Forestry and Wildlife Kaual District

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## FAX MEMORANDUM

FAX NO. (808) 541-3470

TO:

Kevin Foster, USFWS Pacific Islands Office

FROM:

Tom Telfer

SUBJECT:

Comments on Draft "Trustee Proposed Seabird Restoration

Projects"

Hi Kevin:

I'm involved in a week long ICS training, so do not have as much time to review and comment on this as I would like. But, one proposed project concerns me:

Projects 3 (a and b) These two project parts (a somewhat depends upon b), may not be advisable. I do strongly feel that the radar assessment of night flying seabird populations is a very worthy project, and is to my mind the only really viable means of getting a true picture of the sher iter/petrel population status on Kauai. This part i agree with, it is part b, that I am concerned about.

I'm sure that some predation of seabirds in the interior nesting colonies occurs. I have documented some myself when I spent considerable time studying in the Kalaheo Colony. However, The nature of the terrain and habitat is such that ANY human activity to conduct such "predator control" may be more damaging than helpful. I do not think that we are at the stage of knowledge at this point where we can justify expensive trapping or poisoning programs. It is mere conjecture that predation is the major reason for seabird "decline" (at least on Kauai). The Dark-rumped petrel habitat in Haleakala, Maul is far different from that which is on Kauai. About the only non-obtrusive method for predator control within densely vegetated habitats on Kauai, would be aerial drops of rodenticides, or felicides (which I doubt is likely to be approved for use in the immediate future). We must be very careful not to try to "solve" a problem that might not in reality be as bad as we may think it is, and in the long run expose the birds to added risk by too much human impact to their pristine nesting habitat.

I would much rather see effort be made toward some good research on feral cat and rat densities and movements in similar habitats (on a representative local scale first). I realize that the TESORO mitigation may not be able to be routed toward "research," but I fear that we may do more damage than benefit by jumping the gun on this predator

issue. Additionally, what I know of most Dark-rumped Petrei and Newell's Shearwater nesting habitation Kauai (much of it is totally inaccessible to humans, and probably cats too). Rate are another problem. They are everywhere, but control of them is almost impossible in the dense vegetation the birds nest in (unless an aerially applied redenticide were to be used). Owis would be nearly impossible to control, owing to the fact that the Barn Owl would be very difficult to selectively remove in light of the presence of the native Puec.

I recommend CAUTION about predator control activities, without knowing more about the reality of it, and the means to do it safely, economically, and with boneficial results. Predator control in more accessible lowland areas (wedge-tailed shearwater nesting colonies) is justifiable, and is an alternative. Dogs are a serious problem in some non-refuge areas on Kauai. It would take effort, but some landowners may agree to some foncing and other means of predator control

One final comment; Item No. 8: Habitat Improvement for Wedge-tailed Shearwaters, Just a note of caution, we should be careful not to get too excited about using human intervention where it may be unwise in the long term. To create a lot of artificial burrows at Kilauea Point to enhance nesting success, may actually remove one of nature's natural limiting factors. More is not necessarily better! I have seen very high densities of Wedge-tails nesting on Crater Hill (It seems to have increased as a result of active cat trapping somewhat related to Nene protection). There is no lack of burrow nesting seabird density at Kilausa Point and Crater Hill. To cram more birds into the area may invite disease or parasite problems. Refuge personnel have removed a lot of "alien" vegetation in attempts to convert to entirely native plant species, which is admirable. However some of the erosion scars may be due to the loss of some of the aggressive nonnative plants that have been removed. I have noticed on Macula Point, that certain nonnative grasses seem to be one of the more favored ground covers in habitats used  $L_{x}$  burrowing shearwaters where densities are very high, and burrows are quite secure. To put in a lot of shearwater "condos" (manmade enhancements) may actually cause problems in the future. It takes away from one of nature's natural limiting factors to a healthy seabird population. Artificial burrows may be justifiable with more rare species, where habitat degradation ir inadequacy is critical to their survival, but not necessarily for a common species like the Wedge-tall. Some of the limiting factors of seabirds may be related to palagic influences (food supply, pollutants, natural cycles, etc.) The poor nesting results of Laysan Albatross at Kilauea Point (Is a case in point). What we see in the "apparent" trends of seabirds may be much more complex that we realize. To take "management actions" without thorough understanding what we are doing may do more harm than good.

I recommend rethinking the idea of predator control in mountain nesting habitats, and also consider the advisability of wholesale artificial burrow enhancements.

Thanks for the opportunity to comment.

Tom Telfer Form J. Cleren

cc: Carol Terry